

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>LA UNION DEL PUEBLO ENTERO, et al.</b>	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	<b>Case No: 5:21-cv-844-XR</b>
	§	
<b>GREGORY ABBOTT, et al.</b>	§	
<i>Defendants</i>	§	

---

<b>TEXAS STATE LULAC; VOTO LATINO</b>	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	<b>Case No: 1:21-cv-786-XR</b>
	§	
<b>JOSE ESPARZA, in his official capacity as Texas Deputy Secretary of State, et al</b>	§	
<i>Defendants.</i>	§	

**DEFENDANT YVONNE RAMÓN'S ORIGINAL DISCLOSURES**

COMES NOW Defendant Yvonne Ramón and submits these initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

**A. PERSONS WITH KNOWLEDGE OF INFORMATION RELEVANT TO  
DISPUTED FACTS ALLEGED WITH PARTICULARITY.**

Information about Hidalgo County voter registration and participation; information about the probable impact of SB 1 on Hidalgo County voters:

Yvonne Ramón  
Hidalgo County Elections Administrator  
P.O. Box 659  
Edinburg, TX 78539

Information about Hidalgo County voter registration and participation; information about

the probable impact of SB 1 on Hidalgo County Voters:

Hilda Salinas  
Assistant Director, Elections Department  
P.O. Box 659  
Edinburg, TX 78539

Information about Hidalgo County elections procedures:

Melissa Alvarez  
Division Manager, Elections Operations  
P.O. Box 659  
Edinburg, TX 78539

Information about Hidalgo County voter registration:

Belinda Sagredo  
Division Manager, Voter Registration  
P.O. Box 659  
Edinburg, TX 78539

Information about state-wide voter registration and participation; information about the interpretation and implementation of SB 1:

John B. Scott  
Secretary of State  
P.O. Box 12887  
Austin, Texas 78711

Information about state-wide voter registration and participation; information about the interpretation and implementation of SB 1:

Keith Ingram  
Texas Secretary of State  
Director, Elections Division  
P.O. Box 12060  
Austin, Texas 78711

Additional witnesses who may have discoverable information that Defendant may rely upon to assert her claims include: (1) all expert witnesses designated by any party in any of the consolidated cases; (2) all individuals designated by any party in any of the

consolidated cases as a Rule 30(b)(6) witness; (3) all individuals or entities served with a subpoena by any party in any of the consolidated cases during the course of this suit; (4) all individuals or entities noticed and/or deposed in any of the consolidated cases; and (5) all individuals or entities referred to in any document produced by any party or other individual or entity in any of the consolidated cases.

Defendant will timely amend or supplement this list of persons having knowledge of facts relevant to her defenses as the investigation into the facts relevant to this case continues.

Defendant further reserves the right to modify the above list and to identify and call as witnesses additional persons if, during the course of the investigation and discovery related to this case, Defendant learns that such additional persons have knowledge or information that Defendant may use to support her defenses.

**B. DESCRIPTION OF DOCUMENTS RELEVANT TO DISPUTED FACTS ALLEGED WITH PARTICULARITY.**

The legislative history of SB 1 may be found, in part, at:

<https://capitol.texas.gov/BillLookup/History.aspx?LegSess=873&Bill=SB1>

Defendant specifically reserves the right to amend or supplement these disclosures as Defendant identifies additional documents to support her defenses. Defendant also reserves the right to rely upon documents that are identified by other parties to this consolidated litigation in their respective Rule 26(a) disclosures and/or documents produced by any party or other individual or entity in any of the consolidated cases.

**C. COMPUTATION OF DAMAGES**

Not applicable to Defendant.

**D. INSURANCE AGREEMENT**

Not applicable to Defendant.

**E. DISCLOSURE OF EXPERTS**

With respect to testifying expert witnesses, Defendant has none at this time, other than counsel of record, who may testify on the issue of reasonable attorney's fees, if necessary.

Defendant is making her initial disclosures based on the information reasonably available to her at this point in time, in accordance with Rule 26(a)(1) and subject to all potential objections regarding discovery and stays of discovery. As additional information becomes available to Defendant, this disclosure will be supplemented in accordance with the Federal Rules of Civil Procedure.

Signed on the 5<sup>th</sup> day of November, 2021.

Respectfully submitted,

RICARDO RODRIGUEZ, JR.  
CRIMINAL DISTRICT ATTORNEY  
HIDALGO COUNTY, TEXAS

/s/ Josephine Ramirez-Solis  
Josephine Ramirez-Solis  
Assistant District Attorney  
Texas Bar No. 24007894  
josephine.ramirez@da.co.hidalgo.tx.us  
Leigh Ann Tognetti  
Assistant District Attorney  
Texas Bar No. 24083975  
leigh.tognetti@da.co.hidalgo.tx.us  
100 E. Cano, First Floor  
Hidalgo County Courthouse Annex III  
Edinburg, Texas 78539  
Tel: (956) 292-7609  
Fax: (956) 318-2301  
ATTORNEY FOR DEFENDANT  
YVONNE RAMÓN

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant Yvonne Ramón's Original Disclosures was served on all parties and counsel of record via CM/ECF on November 15, 2021.

/s/ Josephine Ramirez-Solis  
Josephine Ramirez-Solis  
Attorney for Defendant Yvonne Ramón